Comments on NJDEP White Paper: SCS004B - Flares in a Petroleum Refinery

Control Measure Summary (from NJDEP White Paper)		Emissions (tons/year) in NJ (from NJDEP White Paper)	
2002 existing measure: NSPS Subpart J	VOC in 2002	515	
	SO2 in 2002	332	
	NOx in 2002	135	
Candidate Measure 1: Flare Gas Recovery System Emission Reductions: VOC and HAPs as well as NOx & SOx. Percent emission reductions depend upon percent of flare gas recovered.	VOC 2002 Base: Reduction: 2009 Remaining:	515 <u>- 186</u> 329	
Control Cost: Capital cost of FGR system is \$1.0 to \$5.0 million. Operation & Maintenance Cost: \$100,000 to \$400, 000 per year. Timing of Implementation: By end of 2009.	NOx 2002 Base: Reduction: 2009 Remaining:	135 - 48 87	
Implementation Area: OTC	SO2 2002 Base: Reduction: 2009 Remaining:	332 <u>-105</u> 227	

Policy Recommendation of State/Workgroup Lead: Flare Gas Recovery (FGR) system is recommended to achieve reduction in VOC emissions and HAP emissions, as well as NOx & SOx emissions.

Brief Rationale for Recommended Strategy: Beside major reduction in emissions, the FGR system allows cost savings because the recovered gases can be used as fuel or process feedstock. Cost savings due to recovery can be \$300,000 per year to \$1,000,000 per year; consequently, the annual cost can be low and the capital cost can be recovered in 3 to 7 years depending upon the facility and FGR system. The State of California has developed a specific rule for FGR system.

Comments of	n NJDEP	White Paper	
	II I TODEL	vviiite i apei	

NJDEP should reference the source(s) for the emission data so that comments can be provided. As presented, there is insufficient background information to assess the accuracy of the emission estimates.

NJDEP provides insufficient information to evaluate the accuracy of the documented VOC, NOx, and SOx reductions. NJDEP should provide the basis for the reductions so that detailed comments can be provided.

NJDEP provides insufficient information to evaluate the accuracy of the documented control cost. As documented in the Stationary Combustion Source Workgroup report, "A Collaborative Report Presenting Air Quality Strategies for Further Consideration by the State of New Jersey" dated October 31, 2005, the SCS workgroup identified a capital cost for Flare Gas Recovery (FGR) of \$15 to \$20 million, not \$1.0 to \$5.0. As presented, there is insufficient background information to assess the accuracy of both the capital costs and operation and maintenance costs presented by NJDEP.

As a general comment, the candidate control measure presented in this white paper (SCS004B) is inconsistent with those presented in the Stationary Combustion Source Workgroup report, "A Collaborative Report Presenting Air Quality Strategies for Further Consideration by the State of New Jersey" dated October 31, 2005. As stated in the report, Candidate Measure 1, most refinery fuel gas is currently being recovered and any gas that may be sent to a flare is being addressed by EPA enforcement actions and/or Section 114 consent decrees. Adoption of rules and/or policies to require flare gas recovery systems is an unnecessary and misguided use of NJDEP's resources that will simply add an additional layer of requirements in an attempt to achieve what will already be accomplished through EPA enforcement actions and/or Section 114 consent decrees. If enacted, an additional layer of requirements will likely prove to be overly burdensome and problematic to comply with, when coupled with existing consent decrees.